

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: LIQUID ALUMINUM	:	
SULFATE ANTITRUST LITIGATION	:	Civil Action No. 16-md-2687 (MCA)(JAD)
	:	
<i>This Document Relates to</i>	:	
<i>Indirect Purchaser Plaintiffs</i>	:	
	X	

INDIRECT PURCHASER PLAINTIFFS’ MOTION
TO APPROVE DISTRIBUTION OF SETTLEMENT FUND

Indirect Purchaser Plaintiffs (“IPPs”) move this Court for an order approving distribution of the net Settlement Fund and in support state:

1. On October 25, 2019, this Court entered its Order regarding Settlement Motions [ECF 1399-2] which approved the all-cash \$33,000,000 settlements achieved for the benefit of the class of purchasers of Liquid Aluminum Sulfate.
2. This Court also approved the Plan of Allocation which provided for a *pro rata* allocation and payment to eligible members of the Class.
3. A.B. Data, Ltd., the approved Claims Administrator, has completed the processing of eligible claims and, in accordance with the Plan of Allocation, makes the allocation of the net settlement fund to eligible members of the Class.
4. Attached hereto is the Declaration of Eric J. Miller which describes the process by which A.B. Data completed the allocation for distribution of the Settlement Fund.
5. The net settlement fund has a balance at least of \$19,709,932.75 since earnings continue to accrue daily. Based on the dollar value of eligible claims determined by A.B. Data, eligible claimants will recover at least 73.029% of their damages. This is an outstanding recovery for the Class and warrants approval of the distribution. The court should

approve the AB Data fees and expenses as set forth in the attached Eric Miller Declaration, and approve the distribution.

Dated: October 21, 2020

Respectfully submitted,

Indirect Purchaser Plaintiffs

s/ *Marvin A. Miller*

Marvin A. Miller
Miller Law LLC
115 S. LaSalle Street, Suite 2910
Chicago, IL 60603
(312) 332-3400

s/ *Jay B. Shapiro*

Jay B. Shapiro
Stearns Weaver Miller Weissler
Alhadeff & Sitterson, P.A.
Museum Tower
150 West Flagler Street, Suite 2200
Miami, FL 33130
(305) 789-3229

Class Counsel for Indirect Purchaser Plaintiffs